

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SERVCO INSURANCE SERVICES
WASHINGTON, LLC,

Plaintiff,

v.

JAY SOROKA, CHRISTOPHER BRUMFIELD,
and MELANIE KELLY,

Defendants.

NO. 2:20-CV-00313-RSL

**STIPULATED MOTION AND ORDER
REGARDING SECOND AMENDED
EXPEDITED DISCOVERY AND
PRELIMINARY INJUNCTION
BRIEFING SCHEDULE**

Plaintiff Servco Insurance Services Washington, LLC (“Servco”) and Defendants Jay Soroka, Christopher Brumfield and Melanie Kelly (“Defendants”), having agreed to further extend the expedited discovery and preliminary injunction briefing schedule to facilitate ongoing settlement negotiations (and after previously agreeing amongst themselves to extend document production and deposition deadlines to focus on settlement discussions), jointly request that this Court enter an order as follows:

- (1) Expedited discovery and briefing related to Servco’s motion for a preliminary injunction shall proceed according to the amended schedule set forth below.
- (2) The temporary restraining order (Dkt. 35) shall continue in full force and effect until the Court rules on Servco’s motion for a preliminary injunction, if such a motion is filed on or before August 3, 2020. If no motion is filed on or before August 3, 2020,

the temporary restraining order shall immediately dissolve unless further agreement is made by the parties or the Court has, for good cause, extended the filing deadline, in which case the temporary restraining order will expire when the Court has adjudicated that motion.

Second Amended Schedule for Expedited Discovery & Preliminary Injunction Briefing

New Deadline	Event
June 26, 2020	Deadline to produce documents in response to requests for production and subpoena to Alliant.
July 16-28, 2020	Depositions to occur. Depositions are limited to three hours or less, without prejudice to completing the depositions in accordance with the Federal Rules of Civil Procedure after the preliminary injunction motion is resolved. At least seven days' notice shall be provided to the deponent. If a Rule 30(b)(6) deposition is noted, any objections are to be served within two calendar days of receipt of the deposition notice and the parties are to meet and confer within two days of receipt of the objections. The parties may conduct the depositions by a mutually-acceptable web-based interface for remote depositions (e.g., TSG Reporting's LiveLitigation software).
August 3, 2020	Servco to file and serve motion for preliminary injunction , and note it on the Court's calendar for consideration on Friday, August 21, 2020.
August 14, 2020	Defendants to file and serve opposition to motion for preliminary injunction.
August 21, 2020	Servco to file and serve reply in support of motion for preliminary injunction.
August 21, 2020	Note Date for Consideration of Preliminary Injunction. Servco shall note its motion for preliminary

New Deadline	Event
	injunction on the Court's calendar for consideration on this date.

DATED this 11th day of June, 2020.

DAVIS WRIGHT TREMAINE LLP

BYRNES KELLER CROMWELL LLP

By /s/ Aaron K. Stuckey

Robert J. Maguire, WSBA No. 29909
Zana Bugaighis, WSBA No. 43614
Aaron K. Stuckey, *pro hac vice*
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Fax: (206) 757-7700
robmaguire@dwt.com
zanabugaighis@dwt.com
aaronstuckey@dwt.com
Attorneys for Plaintiff

By /s/ Keith D. Petrak

Keith D. Petrak, WSBA #19159
Jacob A. Zuniga, WSBA #48458
1000 Second Avenue, 38th Floor
Seattle, WA 98104
Telephone: (206) 622-2000
Fax: (206) 622-2522
kpetrak@byrneskeller.com
jzuniga@byrneskeller.com

Debra L. Fischer, *pro hac vice*
Seth M. Gerber, *pro hac vice*
Adam E. Wagmeister, *pro hac vice*
Morgan Lewis & Bockius LLP
2049 Century Park East, Suite 700
Los Angeles, CA 90067-3109
Telephone: (310) 907-1000
debra.fischer@morganlewis.com
seth.gerber@morganlewis.com
adam.wagmeister@morganlewis.com
Attorneys for Defendants

IT IS SO ORDERED.

Dated this 12th day of June, 2020.



Robert S. Lasnik
United States District Judge